TESTIMONY OF

STUDENT VETERANS OF AMERICA

BEFORE THE

SUBCOMMITTEES ON ECONOMIC OPPORTUNITY

AND

TECHNOLOGY MODERNIZATION

OF THE

COMMITTEE ON VETERANS' AFFAIRS

U.S. HOUSE OF REPRESENTATIVES

JOINT HEARING ON THE TOPIC OF:

"MOVING BEYOND PATCHWORK SYSTEMS: THE FUTURE OF
EDUCATION SERVICES IT"

SEPTEMBER 16, 2020

Chairman Levin, Chairwoman Lee, Ranking Member Bilirakis, Ranking Member Banks, and Members of the Subcommittees:

Thank you for inviting Student Veterans of America (SVA) to submit our testimony on the future of the Department of Veterans Affairs Education Services information technology (IT) infrastructure.

Established in 2008, SVA is a national nonprofit empowering student veterans as they transition to civilian life through the resources, network support, and advocacy needed to succeed in higher education and beyond. With over 1,500 Campus Chapters across the U.S. and in three countries overseas, serving 750,000 student veterans and military-affiliated students, SVA establishes a lifelong commitment to each student's success, from campus life to employment, through local leadership workshops, national conferences, and top-tier employer relations. As the largest chapter-based student organization in America, we are a force and voice for the interests of veterans in higher education, and SVA places the student veteran at the top of our organizational pyramid.

Edward Everett, our nation's 20th Secretary of State, and the former President of Harvard University was famously quoted as stating, "Education is a better safeguard of liberty than a standing army." While we have the finest military that the world has ever known, the sentiment remains; the importance of education to our nation's national security continues to be critical. SVA believes student veterans are yesterday's warriors, today's scholars, and tomorrow's leaders.

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SVA appreciates the opportunity to share our views on an important topic that will directly impact student veterans, military-connected students, and their families. Many recent bills have required significant changes to VA's outdated IT infrastructure, an overdue sign of progress for a pressing need. But while Congress has recognized VA's IT systems are inadequate and demanded upgrades, and VA's overall budget has reached historic highs, much of the funding made available for such improvements have gone to the Veterans Health Administration (VHA).

While those improvements are unquestionably important, the lack of dedicated Veterans Benefits Administration (VBA) IT funding is stalling meaningful reforms. SVA strongly encourages Congress to find a way to fully fund VBA's IT improvements as soon as possible; in the spirit of good financial stewardship, hold the agency accountable for accomplishing these tasks in a timely, cost-effective manner. In addition, as these Committees continue to review ways to support VA's IT mission, we have several recommendations for improvements that will improve the delivery of benefits and quality of life of student veterans everywhere, contingent upon sufficient dedicated funding.

VBA IT funding. If we could summarize this entire statement in a sentence, it would be "IT modernization efforts must be coupled with dedicated IT funding increases." As we have seen over the past few years, VA's outdated IT systems continue to plague the agency and cause significant issues for student veterans and others. With an enormous amount of technical debt accrued by the agency in the last 40 years, VA Education Service must continue to communicate clearly with Congress and stakeholders on its IT infrastructure modernization needs. In turn, we strongly urge Congress to consider the total cost of every change, adjustment, or mandate to VA and adequately appropriate and protect the funds with legislative language that ensures it is spent as intended. To meet the needs of our veterans, VA Education Service platforms must become a cohesive system of applications, not the patchwork systems of yore.

Digital Certificates of Eligibility. SVA continues to support allowing VA's Certificates of Eligibility (COEs) to be processed and delivered digitally. This may be more important today than ever as significant delays in posted mail across the country are hindering what is an already slow process, threatening to disrupt student veterans' timing and ability to verify their eligibility for the GI Bill. Perhaps the best description of how this change will improve the lives of student veterans comes directly from VA's current and previous annual budget submissions:

> *"Currently, our timeliness measure for issuing a Certificate of Eligibility (COE) is 24 days, and 14 days for supplemental claims. A fully automated supplemental claim is processed in one day. Similar to the automation results for supplemental claims, automating COEs will reduce the wait time for some Veterans*
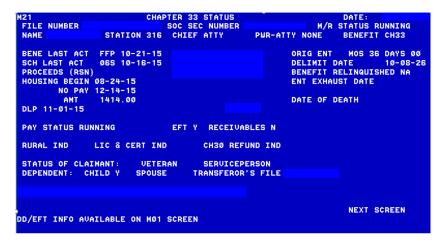
to learn of their eligibility for the Post-9/11 GI Bill. Electronic letters have the potential to greatly reduce the current costs of printing award letters, as claimants under Chapter 33 typically receive multiple, multi-page letters over the course of a year. Electronic letters will provide the opportunity for Veterans to decline to receive paper award letters and to view their award letters online instead."[1,2]

SVA strongly supports this change and hopes that these Committees will strengthen their call to enhance the speed and efficiency of benefits delivery to student veterans and schools everywhere.

The Digital GI Bill. The Independent Budget (IB), a collection of well-respected Veterans Service Organizations (VSOs), has recommended a big-picture idea that we at SVA strongly support: The Digital GI Bill. The idea is simple at its core: A one-time complete IT overhaul for VA Education Services platforms. SVA would like to offer the following solution: The recent Coronavirus Aid, Relief, and Economic Security of CARES Act provided $2.15 billion for IT infrastructure upgrades to VA's Veterans Health Administration (VHA) silo.[3] If it would not have a negative impact on the health upgrades being made to combat COVID-19, Congress should authorize the transfer authority of at least $250 million from VHA to VBA for desperately needed IT upgrades.

Consider VBA's primary database and payment system, the Benefits Delivery Network (BDN). BDN is only one system of many that VBA uses to administer benefits to veterans every year, but it is arguably the most important. According to VA's Office of Information and Technology, "VA processes more than 12 million benefit transactions every month and distributes billions of dollars in Veteran entitlements every year" and BDN controls those transactions for the largest subsets of VBA: Compensation Services, Pension & Fiduciary, Education Services, and Veterans Readiness & Employment.[4,5] BDN is 55 years old and "poses significant risks to VA's ability to provide benefits Veterans need in a secure and timely manner." [6,7] BDN was written in COBOL, a programming language created in 1959 that is so old it had its own exhibition on view at the National Museum of American History nearly a decade ago.[8]

For reference, BDN displays like this[9]:

[1] Department of Veterans Affairs. FY 2021 Budget Submission, Volume III. Pg. 219. https://www.va.gov/budget/docs/summary/fy2021VAbudgetvolumeIIIbenefitsBurialProgramsAndDeptmentalAdministration.pdf

[2] Department of Veterans Affairs. FY 2020 Budget Submission, Volume III. https://www.va.gov/budget/docs/summary/archive/FY-2020-VA-BudgetSubmission.zip

[3] Congress.gov. *The Coronavirus Aid, Relief, and Economic Security Act or CARES Act.* 116th Congress. https://www.congress.gov/bill/116th-congress/house-bill/748/text

[4] Department of Veterans Affairs, Office of Information and Technology. *2017 Year In Review*. https://www.oit.va.gov/reports/year-in-review/2017/index.cfm?v=modernization&project=benefits

[5] Department of Veterans Affairs. *FY 2018 – 2024 VA Enterprise Roadmap*. As of January 2, 2020. P. 55. https://www.ea.oit.va.gov/EAOIT/docs/Apr2020/FY-2018-2024-VA-Enterprise-Roadmap.pdf

[6] Government Accountability Office. *Information Technology: Federal Agencies Need to Address Aging Legacy Systems*. May 2016. https://www.gao.gov/assets/680/677436.pdf

[7] Department of Veterans Affairs, Office of Information and Technology. *2017 Year In Review*. https://www.oit.va.gov/reports/year-in-review/2017/index.cfm?v=modernization&project=benefits

[8] National Museum of American History. *COBOL: Introduction*. https://americanhistory.si.edu/cobol/introduction

[9] Department of Veterans Affairs. *KNOWVA eBenefits: Chapter 33 BDN Screens and FOES Review*. https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va_ssnew/help/customer/locale/en-US/portal/554400000001018/content/554400000076905/9.-Chapter-33-BDN-Screens-and-FOES-Review#904

BDN could have come of age, joined the military, had a fulfilling career, and retired with full benefits *nearly 20 years ago*. And while BDN has been a legacy system targeted for retirement since 2003, BDN is not scheduled for decommissioning until FY2023.[10],[11] SVA strongly encourages these Committees, and Congress as a whole, to dedicate considerable funding to the upgrade of this critical IT system, and more, so our veterans may be served by a system that is not old enough to be their parent.

GI Bill Comparison Tool updates. As illustrated above, antiquated VA IT systems continue to be at the root of the challenges VA experiences in ensuring efficient and timely access to benefits. As we begin the third decade in the twenty-first century, the time is past to address this systemic issue. VA Education Service platforms are in desperate need of a system that can adapt and change with the landscape. A prime example of this is the GI Bill Comparison Tool.

We believe raising the quantity and quality of information available to veterans makes them savvier consumers and allows them to make better-informed decisions on how to use their education benefits.[12] The GI Bill Comparison Tool is, conceptually, designed to do just that. Even now it can be invaluable to veterans considering their educational options. However, as with all good ideas, there remain important changes to make which will result in substantial improvements.

The lack of coordination between the College Navigator, College Scorecard, and GI Bill Comparison Tool reduces the overall delivery of powerful data to veterans.[13],[14],[15] The Comparison Tool has unique data, necessitating a separate tool from ED's options, but the underlying data is not being shared effectively leaves prospective students an incomplete view of their options.

The data running the Comparison Tool are largely restricted to VA's internally available data, which are also limited, notably excluding many student veterans who run out of benefits prior to graduation or elect alternative funding sources. Noting these limitations, SVA appreciates the continued availability of the raw data powering the GI Bill Comparison Tool, which affords external entities to run complementary research and analysis to support additional feedback to VA and policymakers.

There are several additional improvements we believe would make the tool a more effective and complete information source for students. The tool currently lacks an effective side-by-side comparison function. Students primarily use the tool for its "look up" function for familiar institutions as that is effectively the best option the tool currently offers. Student veterans should also be able to rate their schools, thereby affording future student veterans direct consumer feedback like Amazon's verified user rating system. In 2013, Public Law 112-249 mandated the statutory requirement for VA to launch, "a centralized mechanism for tracking and publishing feedback from students," like 'Amazon reviews,' yet this functionality is still missing.[16]

Finally, we encourage VA to develop a mechanism to maintain closed schools within the tool, versus having them merely disappear. This disappearance of schools from the tool also applies to the associated data, leaving significant gaps in the overall picture. SVA fully acknowledges proposed improvements will require dedicated IT funds and reasonable time for VA to implement. We hope to see dedicated funds included for these projects in future budgets and proper consideration of reasonable timelines for VA to efficiently and effectively implement such policies.

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[10] Department of Veterans Affairs. *FY 2018 – 2024 VA Enterprise Roadmap*. As of January 2, 2020. P. 55.
https://www.ea.oit.va.gov/EAOIT/docs/Apr2020/FY-2018-2024-VA-Enterprise-Roadmap.pdf
[11] Department of Veterans Affairs. *FY 2018 – 2024 VA Enterprise Roadmap, Executive Summary*. As of January 2, 2020.
https://www.ea.oit.va.gov/EAOIT/docs/Apr2020/FY-2018-2024-VA-Enterprise-Roadmap-Exe-Sum.pdf
[12] Hearing on the Topic of: "Legislative Priorities of 2019" Before the House and Senate Veterans Affairs Committees, 116th Cong. (2019) (testimony of Student Veterans of America) available athttps://www.veterans.senate.gov/imo/media/doc/5%20-%20SVA%20Testimony%2003.07.19.pdf.
[13] College Navigator, National Center for Education Statistics, US Department of Education, https://nces.ed.gov/collegenavigator/, Accessed 01 March 2020
[14] College Scorecard, US Department of Education, https://collegescorecard.ed.gov/, Accessed 01 March 2020
[15] GI Bill Comparison Tool, US Department of Veterans Affairs, https://collegescorecard.ed.gov/, Accessed 03 February 2020
[16] Public Law 112-249, "Comprehensive Veterans Education Information Policy",
https://www.govinfo.gov/content/pkg/PLAW112publ249/pdf/PLAW-112publ249.pdf

GI Bill Feedback Tool. SVA strongly believes improving the quantity and quality of information available to veterans allows them to make better-informed decisions about how to use their education benefits.[4] To that end, we provide several recommendations below to maximize the quality, utility, and clarity of the information collected through the GI Bill Feedback Tool.

Increase Transparency

SVA recommends the Department improve the transparency of the Feedback Tool by expanding the scope of complaint information that is made public. Currently, the GI Bill Comparison Tool only displays the number of complaints submitted in the last 24 months disaggregated into several broad categories.[17] The tool includes a "source" link for the complaints, but it only directs users to the Comparison Tool's "About" page, which simply explains how the tool functions.[18] This link provides no additional, specific information about a particular school's complaints.

SVA encourages the Department to publish and maintain a comprehensive database of all school-specific complaints submitted through the Feedback Tool. Students should be given the option to disclose their narrative comments publicly, and those comments should be included in the database. The feedback database should be presented in a familiar interface, preferably one that mirrors other popular review websites. This means it should include helpful user features like search, filters, and sorting.

We further recommend the Department include a link on each school's profile page in the GI Bill Comparison tool that directs students to a full, detailed list of complaints submitted about that institution. This will help students identify and better understand the true nature of complaints submitted about each school. It will also improve the ability of advocates and researchers to monitor and analyze past and present institutional compliance with the Principles of Excellence and other laws.

Revise Feedback Topic Names and Descriptions

SVA recommends VBA revise the names of certain feedback topics to include language that student veterans and military-connected students would more readily identify with.[19] For example, the word "recruiting" in the topic name "Recruiting and Marketing" could be replaced with the phrase "admissions or enrollment."[20] Most students experience deceptive recruiting practices when interacting with an "admissions advisor," "military advisor," or someone with a similar title – not a "recruiter."[21] Unless they are competitive athletes, most students do not have contact with a recruiter and do not think about the enrollment process as them being recruited. Replacing the word "recruitment" with "admissions or enrollment" better matches most student experiences.

We also ask that VBA expand the feedback topic descriptions to help students better understand which category best matches their experience. For instance, the current "Quality of Education" topic only provides the following description: "The school doesn't have qualified teachers." This description is far too limited. Quality of education is an expansive topic which might include, among other things, a lack of promised experiential learning, inadequate course materials, or the absence of other promised resources. Many of the other topic descriptions suffer from a similar lack of clarity and detail.

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[17] *E.g.*, *GI Bill Comparison Tool – Ashford University*, U.S. DEPARTMENT OF VETERANS AFFAIRS, https://www.va.gov/gi-bill-comparison-tool/profile/21123205.

[18] *GI Bill Comparison Tool: About This Tool*, U.S. DEPARTMENT OF VETERANS AFFAIRS (May 8, 2020), https://www.benefits.va.gov/gibill/comparison_tool/about_this_tool.asp.

[19] *See Veterans Serving Organizations VA Complaint System Comments* 1-2 (Oct. 15, 2013) *available at* https://www.regulations.gov/document?D=VA-2013-VACO-0001-0555 (highlighting past requests by SVA and other veterans serving organizations for the Department to implement such changes).

[20] *See id*.

[21] *See id*.

The Department should consider including one or two broad topic descriptions under each topic name and add a hover-over icon next to each topic with additional descriptions or hypothetical scenarios. This would help veterans more easily identify which topic is the proper selection for their complaint. Our recent coalition comment on this issue provides a complete list of proposed revisions to topic names and descriptions.[22]

Issue Caution Flags for Student Complaints

SVA recommends VBA place caution flags on institutions in the GI Bill Comparison Tool that receive a substantial number of student complaints. The Department currently places a caution flag on schools in the GI Bill Comparison Tool when "VA or other federal agencies like the Department of Education or Department of Defense have applied increased regulatory or legal scrutiny to a program of education."[23] VBA does not, however, use caution flags to mark schools that receive a large number of student complaints through the GI Bill Feedback Tool.

Student veterans and military-connected students deserve to know when a school receives a disproportionately large number of complaints, and, in such cases, should be provided with a conspicuous warning in the form of a caution flag.[24] VBA might consider issuing caution flags in two different scenarios: one flag for schools with a large number of complaints during a recent period and a separate flag for schools with a large number of total complaints.

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SVA thanks the Chairman, Chairwoman, Ranking Members, and Subcommittee members for their time, attention, and devotion to the cause of veterans in higher education. As always, we welcome your feedback and questions, and we look forward to continuing to work with this Subcommittee and the entire Congress to ensure the success of all veterans through education during this difficult time.

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[22] *Comment to VA on the Collection of Reports and Notices from State Approving Agencies* 3-4 (2020) *available at* https://vetsedsuccess.org/comment-on-the-department-of-veterans-affairs-principles-of-excellence-complaint-system-intake/.
[23] *GI Bill Comparison Tool: About This Tool – Caution Flags*, U.S. DEPARTMENT OF VETERANS AFFAIRS (May 8, 2020), https://www.benefits.va.gov/gibill/comparison_tool/about_this_tool.asp.
[24] *See* Letter from Derek Fronabarger, Director of Policy, Student Veterans of America and Walter Ochinko, Policy Director, Veterans Education Success to Robert Worley, Director of the Education Service, Department of Veterans Affairs 1 (May 10, 2016), *available at* https://vetsedsuccess.org/wp-content/uploads/2019/01/gi-bill-comparison-tool-letter-worley.pdf (explaining that "[v]eterans have only one shot at using their GI Bill benefits and, therefore, any caution flags that could inform veterans' choice should be included on the Comparison Tool.").